

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,
Plaintiff,

v.

CIVIL ACTION NO. 3:17-01362

AMERISOURCEBERGEN
DRUG CORPORATION, et al.,
Defendants.

CABELL COUNTY COMMISSION,
Plaintiff,

v.

CIVIL ACTION NO. 3:17-01665

AMERISOURCEBERGEN
DRUG CORPORATION, et al.,
Defendants.

**AMERISOURCEBERGEN DRUG CORPORATION’S
THIRD SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFFS’
(FIRST) COMBINED DISCOVERY REQUESTS TO DISTRIBUTORS**

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Defendant AmerisourceBergen Drug Corporation (“ABDC”), by and through its undersigned counsel, hereby supplements its responses to Plaintiffs’ (First) Combined Discovery Requests to Distributors (“Combined Requests”). ABDC reserves its right to further supplement these responses and objections as appropriate.

GENERAL OBJECTIONS AND RESERVATION OF RIGHTS

1. ABDC incorporates by reference its General Objections and Reservation of Rights from its Objections and Responses to Plaintiffs' (First) Combined Discovery Requests to Distributors served on November 29, 2019.

COMBINED DISCOVERY REQUESTS re: DISTRIBUTION

Combined Request No. 1. Please produce all transactional data related to the distribution of prescription opioids arising out of CT2 from January 1, 1996, to the present.

RESPONSE:

ABDC incorporates its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the proposed time frame on the grounds that the specified twenty-three year time period is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action.

Subject to and without waiving its objections, ABDC will produce Opioid-related transactional data for Cabell County and the City of Huntington from June 3, 2002 to May 29, 2018 in a format consistent with how the transactional data is maintained by ABDC in the ordinary course of business. ABDC does not have transactional data prior to June 3, 2002 in its possession, custody, or control.

Combined Request No. 2. Please identify in chronological order the title of each Suspicious Order Monitoring System (SOMS) policy in force from January 1, 1996, to the present and produce a copy of the same. After each entry, please identify the Bates range which corresponds to each policy to enable a jury to correlate each policy in your written answer to each document produced.

RESPONSE:

ABDC incorporates herein by reference its General Objections. ABDC further objects to the proposed time frame on the grounds that the specified twenty-three year time period is

overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action. ABDC further objects to the request to identify the Bates range which corresponds to each policy as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced its Order Monitoring Program policies and procedures in effect during the period from January 1, 1998 to May 29, 2018. The Bates numbers for those policies and procedures are included in Appendix A.

SUPPLEMENTAL RESPONSE (March 10, 2020):

ABDC incorporates herein by reference its General Objections. ABDC further objects to the proposed time frame on the grounds that the specified twenty-four year time period is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action. ABDC further objects to the request to identify the Bates range which corresponds to each policy as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, ABDC states that from the time period starting in or around 1998, ABDC has operated three main iterations of its Order Monitoring Program, from approximately 1998 to 2007, 2007 to 2015, and 2015 to present (as is set forth in more detail in documents produced by ABDC and testimony provided by ABDC witnesses). All three iterations of the program were subject to ongoing and periodic updates and enhancements during their respective effective periods. The relevant policies and procedures for ABDC's

Order Monitoring Program were produced previously in this litigation, as summarized in Appendix A. This chart reflects those policies and procedures that have been located and produced in this litigation (with the associated Bates range for each) and lists them in chronological order based on the effective date. Revision dates for the policies and procedures are also provided, as applicable. This request seeks documents dating back up to 20 years or more, and it is possible that additional policies and procedures existed at some time in the past but no longer exist or have not been located, despite reasonable and diligent efforts. ABDC reserves the right to supplement this response.

Combined Request No. 3. Please identify each suspicious order you reported to any regulatory body, including the DEA and/or the West Virginia Board of Pharmacy, arising out of CT2 and produce all documents related thereto. After each entry, please identify the Bates range which corresponds to each suspicious order to enable a jury to correlate each suspicious order in your written answer to each document produced.

RESPONSE:

ABDC incorporates its General Objections. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to the request to identify the Bates range which corresponds to each suspicious order as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC will produce documents sufficient to identify orders flagged by ABDC's

Order Monitoring Program for further review, as well as orders that were determined to be suspicious, from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cabell County and the City of Huntington in West Virginia. Prior to the initiation of its revised Order Monitoring Program in 2007, ABDC reported suspicious orders through means including the use of automated reporting (*see* ABDCMDL00315783), excessive purchase reports (*see, e.g.*, ABDCMDL00316041), and via telephone (*see* ABDCMDL00315783 (letter referencing reporting suspicious orders via telephone)). Following a reasonable investigation, ABDC has not located additional exemplars of the documentation reflecting its reporting of suspicious orders to the DEA during the operation of its 1998 suspicious order monitoring program.

SUPPLEMENTAL RESPONSE (April 17, 2020):

ABDC incorporates by reference its objections and response to this Request as stated above. Subject to and without waiving its objections, ABDC produced Order Monitoring Program data which identifies the orders ABDC reported to DEA between July 2007 and December 2018 for its customers in West Virginia, including orders reported for customers in Cabell County and the City of Huntington. The orders reported to DEA for customers in Cabell County and the City of Huntington between July 2007 and December 2018 can be found at the following Bates numbers:

Pharmacy	DEA Number	Bates
Cabell Huntington Hospital 340B	AC2977556	ABDCMDL01911482
Cabell Huntington Outpatient Pharmacy	BC3917436	ABDCMDL01911479
Drug Emporium	BD0427927	ABDCMDL01911482
Highlawn Preferred Pharmacy, LLC	FH2459077	ABDCMDL01911479
McCloud Family Pharmacy	BM9558733	ABDCMDL01911479; ABDCMDL01911482
Pharmacy Associates Inc	BP0795433	ABDCMDL01911479
Ross Drug	FA3682348	ABDCMDL01911479

Pharmacy	DEA Number	Bates
Safescript Pharmacy #6	BS8246349	ABDCMDL01911482

ABDC's document production is ongoing, and it reserves the right to supplement this response to the extent it locates any additional files identifying suspicious orders arising out of Cabell County and/or the City of Huntington. ABDC employees reviewing and adjudicating orders regularly consult available information and ongoing customer analytics, including but not limited to due diligence files, trend reports, and monthly and weekly dashboards. The adjudication of orders is also informed by an order reviewer's then-existing knowledge of the customer. Further, orders are reviewed and adjudicated at a specific point in time based on then-available data, including the customer's consumption at that point in time. This data that is used to adjudicate orders is not static, and ABDC therefore no longer possesses the exact real-time data used to adjudicate the orders of interest for the pharmacies listed above at the time the specific orders of interest were adjudicated.

ABDC further notes that there is no regulatory requirement that ABDC maintain a file capturing a snapshot of the data it looked at in determining if an order is suspicious. Indeed, there is no regulatory requirement that ABDC maintain a file *at all* for the investigation it conducts into each order it adjudicates or even for each customer it services. Nonetheless, the Bates ranges for the due diligence files located in ABDC's record management systems for ABDC's customers in Cabell County and the City of Huntington are listed in ABDC's Supplemental Response to Combined Request Number 4 below. Additionally, ABDC will produce documents found in custodial files that relate to its customers in Cabell County and the City of Huntington, including relating to adjudicated orders for those customers.

Combined Request No. 4. Please produce the due diligence file for each of your customers in CT2. Please identify the Bates range which corresponds to each due diligence file to enable a jury to correlate each due diligence file to each of your customers.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the request to identify the Bates range which corresponds to each due diligence file as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, ABDC will conduct a reasonable search and produce non-privileged, responsive documents from ABDC's due diligence files for its customers in Cabell County and the City of Huntington to the extent they exist and can be located.

SUPPLEMENTAL RESPONSE (April 17, 2020):

ABDC incorporates by reference its objections and response to this Request as stated above. Subject to and without waiving its objections, ABDC has produced monthly and weekly "dashboards" containing due diligence information regarding ABDC's customers throughout the United States, including those in Cabell County and the City of Huntington. *See* ABDCMDL_VOL109; ABDCMDL_VOL115; ABDCMDL_VOL156; ABDCMDL_VOL158; ABDCMDL_VOL159. ABDC has also produced monthly trend reports containing due diligence information regarding ABDC's customers throughout the United States, including those in Cabell County and the City of Huntington. *See* ABDCMDL_VOL024. Further, ABDC will produce due diligence documents found in custodial files that relate to its customers in Cabell County and the City of Huntington.

In addition to monthly and weekly dashboards, trend reports, and due diligence materials found in custodial files, ABDC has produced due diligence files from its record management

systems (NetDocs and Matter Management) for its customers in Cabell County and the City of Huntington at the following Bates ranges:

Pharmacy	DEA Number	Beg Bates Range	End Bates Range
Cabell Huntington Outpatient Pharmacy	BC3917436	ABDCMDL01910742	ABDCMDL01910821
Continuumcare Pharmacy	FC1712668	ABDCMDL01911386	ABDCMDL01911432
Drug Emporium	BD0427927	ABDCMDL01911188	ABDCMDL01911190
		ABDCMDL01911306	ABDCMDL01911307
		ABDCMDL01911360	ABDCMDL01911360
		ABDCMDL01911365	ABDCMDL01911365
G and R LLC	BG6892625	ABDCMDL01911304	ABDCMDL01911305
		ABDCMDL01911364	ABDCMDL01911364
Highlawn Preferred Pharmacy, LLC	FH2459077	ABDCMDL01911098	ABDCMDL01911105
		ABDCMDL01911353	ABDCMDL01911353
		ABDC-WVFED00000672; ABDCMDL04117544	ABDC-WVFED00000676; ABDCMDL04117548
Marshall Pharmacy	FM4902400	ABDCMDL01910912	ABDCMDL01911011
		ABDCMDL01911108	ABDCMDL01911112
		ABDCMDL01911172	ABDCMDL01911187
		ABDCMDL01911355	ABDCMDL01911355
		ABDCMDL01911359	ABDCMDL01911359
Med Associates Pharmacy Inc	BM6622167	ABDCMDL01911096	ABDCMDL01911097
		ABDCMDL01911352	ABDCMDL01911352
Med Associates Pharmacy, Inc	BM6647739	ABDCMDL01911113	ABDCMDL01911114
		ABDCMDL01911356	ABDCMDL01911356
Medical Arts Supply	BM3744489	ABDCMDL01911312	ABDCMDL01911313
		ABDCMDL01911367	ABDCMDL01911367
Medical Park Pharmacy	BM9592381	ABDCMDL01911106	ABDCMDL01911107
		ABDCMDL01911314	ABDCMDL01911317
		ABDCMDL01911354	ABDCMDL01911354
		ABDCMDL01911368	ABDCMDL01911368
Medical Park Pharmacy LTC	FM2051477	ABDCMDL01911115	ABDCMDL01911140
		ABDCMDL01911357	ABDCMDL01911357
Medicap Pharmacy	BM7641512	ABDCMDL01911318	ABDCMDL01911319
		ABDCMDL01911369	ABDCMDL01911369
McCloud Family Pharmacy	BM9558733	ABDCMDL01911308	ABDCMDL01911311
		ABDCMDL01911366	ABDCMDL01911366
Pharmacy Associates Inc	BP0795433	ABDCMDL01910683	ABDCMDL01910741

Pharmacy	DEA Number	Beg Bates Range	End Bates Range
		ABDCMDL01910841	ABDCMDL01910847
		ABDCMDL01910863	ABDCMDL01910905
		ABDCMDL01910908	ABDCMDL01910911
		ABDCMDL01911191	ABDCMDL01911297
		ABDCMDL01911361	ABDCMDL01911361
Rite Aid #00968	AR6070178/ FW7342316	ABDC- WVFED00063504	ABDC- WVFED00063505
Ross Drug	FA3682348	ABDCMDL01911034	ABDCMDL01911065
		ABDCMDL01911350	ABDCMDL01911350
		ABDC- WVFED00000667; ABDCMDL04117539	ABDC- WVFED00000671; ABDCMDL04117543
S & F Pharmacy	AS7523118	ABDCMDL01911298	ABDCMDL01911299
S & F Pharmacy	BS1588168	ABDCMDL01911320	ABDCMDL01911321
		ABDCMDL01911370	ABDCMDL01911370
Safescript Pharmacy #6	BS8246349	ABDCMDL01911300	ABDCMDL01911303
		ABDCMDL01911322	ABDCMDL01911323
		ABDCMDL01911363	ABDCMDL01911363
		ABDCMDL01911371	ABDCMDL01911371
St Mary's Hospital Pharmacy	BS4645911	ABDCMDL01911012	ABDCMDL01911022
		ABDCMDL01911324	ABDCMDL01911349
		ABDCMDL01911372	ABDCMDL01911372
Walgreen Co. #11980	FW1365748	ABDCMDL01911373	ABDCMDL01911385
		ABDCMDL01911433	ABDCMDL01911433
		ABDCMDL01910653	ABDCMDL01910654
		ABDCMDL01910658	ABDCMDL01910670
Walgreen Co. #11977	FW1925568	ABDCMDL01911373	ABDCMDL01911385
		ABDCMDL01911434	ABDCMDL01911434
		ABDCMDL01910653	ABDCMDL01910670
		ABDC- WVFED00063504	ABDC- WVFED00063505

ABDC's search for responsive documents is ongoing, and many of the customers referenced above have not been serviced by ABDC for many years. Accordingly, ABDC reserves the right to supplement the list of Bates ranges above to the extent it locates any additional files relating to its customers in Cabell County and the City of Huntington in its record

management systems. ABDC will continue to produce documents responsive to this Request on a rolling basis.

Combined Request No. 5. Please identify each sales representative(s) responsible for the CT2 territory and produce the custodial file for each. Please identify the Bates range which corresponds to each custodial file to enable a jury to correlate each name in your written answer to each custodial file produced.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the request to identify the Bates range which corresponds to each custodial file as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, the following are ABDC sales representatives and district directors responsible for Cabell County and the City of Huntington: Michael Perry, Mike Dailey, and Jill Jackson. ABDC will supplement its response to the extent it discovers additional sales representatives and district directors responsible for Cabell County and the City of Huntington. Further, ABDC requests a meet and confer to discuss which sales representatives and district directors will be added as custodians.

Combined Request No. 6. Please produce all documents in your possession, custody and/or control related to Safescript Pharmacy #6 (DEA# BS8246349) formerly located at 335 Fourth Avenue in Huntington, Cabell County, West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the

extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington.

Subject to and without waiving its objections, ABDC will conduct a reasonable search and produce non-privileged documents responsive to this Combined Request.

Combined Request No. 7. Please produce all documents in your possession, custody and/or control related to Anita T. Dawson, DO (CSL# OD0926) formerly practicing medicine at 1798 Midland Trail, Milton, Cabell County, West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs.

Subject to and without waiving its objections, ABDC has not identified any documents related to Anita T. Dawson, DO. To the extent that ABDC identifies non-privileged documents relating to Anita T. Dawson, DO through its review of agreed-upon custodial files, such documents will be produced.

Combined Request No. 8. Please produce all documents produced to the United States House Energy and Commerce Committee arising out of its investigation into "opioid dumping" into West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC

further objects to the undefined term “investigation” as overbroad, ambiguous, and unduly burdensome. ABDC objects to the characterization of “opioid dumping.” ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC has produced documents responsive to this Combined Request at ABDCMDL00003749-ABDCMDL00004230. ABDC will produce additional documents responsive to this Combined Request to the extent they exist.

Combined Request No. 9. Please produce all documents produced to the West Virginia Attorney General.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC has produced documents responsive to this Combined Request at ABDCMDL00035366-ABDCMDL00037251.

Combined Request No. 10. Please produce all documents related to internal investigations referencing the distribution of prescription opioids in West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC’s distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC’s distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia

that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC requests a meet and confer with Plaintiffs to discuss the scope of this Combined Request.

Combined Request No. 11. Please produce all presentations, including PowerPoints or slide decks, referencing the distribution of prescription opioids in West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC previously produced diversion control presentations, including but not limited to ABDCMDL00036528, ABDCMDL00036547, ABDCMDL00084541, ABDCMDL00144790, ABDCMDL00144876, ABDCMDL00158341, ABDCMDL00158342, ABDCMDL00163878, ABDCMDL00175886, ABDCMDL00281014, ABDCMDL00360064, ABDCMDL00360066, ABDCMDL00360069, ABDCMDL00360080.

Further, ABDC requests a meet and confer with Plaintiffs to discuss the scope of this Combined Request.

Dated: April 17, 2020

Respectfully submitted,

/s/ Gretchen M. Callas

Gretchen M. Callas (WVSB #7136)

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2020, AmerisourceBergen Drug Corporation's Third Supplemental Objections and Responses to Plaintiffs' (First) Combined Discovery Requests to Distributors was sent by electronic mail to Counsel for the Plaintiffs and Defendants as follows:

mdl2804discovery@motleyrice.com; xALLDEFENDANTS-MDL2804-
Service@arnoldporter.com.

/s/ Gretchen M. Callas
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Appendix A: ABDC Policies & Procedures Produced in the MDL

Beginning Bates Number	Ending Bates Number	Title	Effective Date	Revised Date (if any)
ABDCMDL00315783	ABDCMDL00315794	1996 – 1998 Letters from the DEA to ABDC re Suspicious Order Monitoring	1996 – 1998	
ABDCMDL00478365	ABDCMDL00478371	Regulatory Compliance & Security Services Policy and Procedures: Controlled Substance Accountability Review Procedure	8/1/1997	
ABDCMDL00478267	ABDCMDL00478267	Regulatory Compliance & Security Services Policy and Procedures: Index	8/1/1997	
ABDCMDL00478285	ABDCMDL00478286	Regulatory Compliance & Security Services Policy and Procedures: Introduction	11/10/1997	
ABDCMDL00478270	ABDCMDL00478271	Regulatory Compliance & Security Services Policy and Procedures: Pharmaceutical Licensing - DEA & State	11/10/1997	
ABDCMDL00478323	ABDCMDL00478323	Regulatory Compliance & Security Services Policy and Procedures: Trend Adjustment Report Review (pending development of report)	11/10/1997	
ABDCMDL00478310	ABDCMDL00478311	Regulatory Compliance & Security Services Policy and Procedures: Variance Report	11/10/1997	
ABDCMDL00478320	ABDCMDL00478322	Regulatory Compliance & Security Services Policy and Procedures: Suspicious Order Reporting Policy and Procedure	2/1/1999	
ABDCMDL00478397	ABDCMDL00478403	Risk Management Group Policy & Procedures: Index	10/1/2000	
ABDCMDL00478628	ABDCMDL00478631	Regulatory Compliance Policy & Procedures: Changes in DEA Registration	11/17/2000	
ABDCMDL00478488	ABDCMDL00478488	Regulatory Compliance Policy & Procedures: Variance Report	11/17/2000	
ABDCMDL00478482	ABDCMDL00478485	Risk Management Group Policy & Procedures: Daily Activity Reports	11/17/2000	
ABDCMDL00478580	ABDCMDL00478583	Security Services Policy & Procedures: Daily Activity Reports	11/17/2000	
ABDCMDL00478594	ABDCMDL00478598	Risk Management Group Policies & Procedures: Index	11/17/2000	
ABDCMDL00478564	ABDCMDL00478565	The Risk Management Department Statement of Policy	11/17/2000	

Beginning Bates Number	Ending Bates Number	Title	Effective Date	Revised Date (if any)
ABDCMDL00478585	ABDCMDL00478585	Audit & Investigations Policy & Procedures: Tracking and Trending Procedures	1/12/2001	
ABDCMDL00478592	ABDCMDL00478593	General Policy & Procedures: Regulatory Update and Legislative Update	1/12/2001	
ABDCMDL00478466	ABDCMDL00478467	Regulatory Compliance Policy & Procedures: Description of Responsibility	1/12/2001	
ABDCMDL00478478	ABDCMDL00478481	Regulatory Compliance Policy & Procedures: External Audits/Inspections (Federal & State Regulatory Authorities)	1/12/2001	
ABDCMDL00478297	ABDCMDL00478297	Regulatory Compliance Policy & Procedures: Federal Register Review	1/12/2001	
ABDCMDL00478385	ABDCMDL00478387	Regulatory Compliance Policy & Procedures: Pharmaceutical Licensing - DEA & State	1/12/2001	
ABDCMDL00478395	ABDCMDL00478396	Regulatory Compliance Policy & Procedures: Suspicious Order Reporting	1/12/2001	
ABDCMDL00478440	ABDCMDL00478440	Regulatory Compliance Policy & Procedures: Trend Adjustment Report Review	1/12/2001	
ABDCMDL00478768	ABDCMDL00478821	AmeriSource Controlled Substance Policy Manual	5/18/2001	
ABDCMDL00478268	ABDCMDL00478269	Regulatory Compliance Policy and Procedures: Index	6/23/2001	
ABDCMDL00478759	ABDCMDL00478761	Policies & Procedures: Index	8/17/2001	
ABDCMDL00478837	ABDCMDL00478960	CSRA Policy & Procedures: Internal Policy and Procedures Manual	10/1/2001	
ABDCMDL00476959	ABDCMDL00477025	AmerisourceBergen Security and Regulatory Compliance Policy & Procedures Manual	10/4/2001	
ABDCMDL00478626	ABDCMDL00478627	Policy & Procedures Table of Contents	11/14/2001	
ABDCMDL00355519	ABDCMDL00355519	Policies & Procedures: October 2004 version of CSRA Form 15, Notice to all Employees re: statutory duty to report diversion	4/12/2002	
ABDCMDL00035451	ABDCMDL00035452	Customer DEA Registration and State License Renewal Procedures	8/27/2002	2/3/2006
ABDCMDL00478174	ABDCMDL00478265	AmerisourceBergen Security and Regulatory Compliance Policy & Procedures Manual	4/1/2004	

Beginning Bates Number	Ending Bates Number	Title	Effective Date	Revised Date (if any)
ABDCMDL00037399	ABDCMDL00037400	Customer DEA Registration and State License Renewal Procedures	10/1/2004	7/28/2008
ABDCMDL00359995	ABDCMDL00359997	Follow-Up Audit Procedures	10/1/2005	
ABDCMDL00359989	ABDCMDL00359991	Pre-Audit Procedures	10/1/2005	
ABDCMDL00359984	ABDCMDL00359988	Distribution Center Audits	10/1/2005	11/10/2006
ABDCMDL00359992	ABDCMDL00359994	Pre-Audit Procedures	10/1/2005	8/27/2007
ABDCMDL00035447	ABDCMDL00035448	Customer DEA Registration and State License Renewal Procedures	10/1/2005	10/23/2008
ABDCMDL00035449	ABDCMDL00035450	Customer DEA Registration and State License Renewal Procedures	10/1/2005	8/31/2010
ABDCMDL00003968	ABDCMDL00003969	Policies & Procedures: Amerisource Compliance Training Program	10/1/2005	8/31/2010
ABDCMDL00035453	ABDCMDL00035454	Policies & Procedures: AmerisourceBergen Compliance Training Program	10/1/2005	2/8/2006
ABDCMDL00037392	ABDCMDL00037393	Policies & Procedures: AmeriSourceBergen Compliance Training Program	10/1/2005	8/31/2010
ABDCMDL00359905	ABDCMDL00359906	Policies & Procedures: ARCOS	10/1/2005	2/3/2006
ABDCMDL00004025	ABDCMDL00004025	Policies & Procedures: Associate Responsibility to Report Diversion	10/1/2005	3/31/2006
ABDCMDL00360000	ABDCMDL00360002	Policies & Procedures: Controlled Drug Variance Report	10/1/2005	
ABDCMDL00037316	ABDCMDL00037317	Policies & Procedures: Corporate Security & Regulatory Affairs (CSRA) Description of Responsibility	10/1/2005	10/1/2009
ABDCMDL00364331	ABDCMDL00364332	Policies & Procedures: CSRA Description of Responsibility	10/1/2005	10/16/2008
ABDCMDL00364333	ABDCMDL00364335	Policies & Procedures: CSRA Description of Responsibility	10/1/2005	2/12/2013
ABDCMDL00364336	ABDCMDL00364338	Policies & Procedures: CSRA Description of Responsibility	10/1/2005	4/10/2014
ABDCMDL00364339	ABDCMDL00364341	Policies & Procedures: CSRA Description of Responsibility	10/1/2005	3/17/2015

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ABDCMDL00364322	ABDCMDL00364325	Policies & Procedures: CSRA Description of Responsibility	10/1/2005	8/8/2017
ABDCMDL00004031	ABDCMDL00004032	Policies & Procedures: CSRA Description of Responsibility	10/1/2005	
ABDCMDL00379811	ABDCMDL00379813	Policies & Procedures: Customer DEA Registration and State License Renewal	10/1/2005	3/16/2018
ABDCMDL00004021	ABDCMDL00004022	Policies & Procedures: Customer DEA Registration and State License Renewal Procedures	10/1/2005	7/28/2008
ABDCMDL00359938	ABDCMDL00359939	Policies & Procedures: Customer DEA Registration and State License Renewal Procedures	10/1/2005	8/31/2010
ABDCMDL00003999	ABDCMDL00003999	Policies & Procedures: Customer DEA Registration Verification	10/1/2005	2/3/2006
ABDCMDL00035457	ABDCMDL00035458	Policies & Procedures: Customer DEA Registration Verification	10/1/2005	2/3/2006
ABDCMDL00359888	ABDCMDL00359889	Policies & Procedures: Customer DEA registration verification	10/1/2005	7/28/2008
ABDCMDL00004019	ABDCMDL00004020	Policies & Procedures: Customer DEA Registration Verification	10/1/2005	9/24/2008
ABDCMDL00359886	ABDCMDL00359887	Policies & Procedures: Customer DEA Registration Verification	10/1/2005	10/23/2008
ABDCMDL00359936	ABDCMDL00359937	Policies & Procedures: Customer DEA registration verification	10/1/2005	8/31/2010
ABDCMDL00379808	ABDCMDL00379810	Policies & Procedures: Customer DEA Registration Verification	10/1/2005	3/16/2018
ABDCMDL00359893	ABDCMDL00359893	Policies & Procedures: Customer File Updates	10/1/2005	7/28/2008
ABDCMDL00359892	ABDCMDL00359892	Policies & Procedures: Customer File Updates	10/1/2005	10/23/2008
ABDCMDL00359890	ABDCMDL00359891	Policies & Procedures: Customer File Updates	10/1/2005	6/23/2009
ABDCMDL00359940	ABDCMDL00359941	Policies & Procedures: Customer File Updates	10/1/2005	7/21/2009
ABDCMDL00379816	ABDCMDL00379817	Policies & Procedures: Customer File Updates	10/1/2005	3/16/2018
ABDCMDL00364270	ABDCMDL00364271	Policies & Procedures: DEA Monthly ARCOS Reporting	10/1/2005	
ABDCMDL00035405	ABDCMDL00035408	Policies & Procedures: Distribution Center (DC) Audits	10/1/2005	10/1/2008

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ABDCMDL00359856	ABDCMDL00359857	Policies & Procedures: Excessive suspicious controlled substances	10/1/2005	1/31/2006
ABDCMDL00359849	ABDCMDL00359850	Policies & Procedures: General Security Controls	10/1/2005	1/26/2006
ABDCMDL00359847	ABDCMDL00359848	Policies & Procedures: General Security Controls	10/1/2005	11/13/2009
ABDCMDL00359998	ABDCMDL00359999	Policies & Procedures: New DCM/Compliance Coordinator Orientation Training	10/1/2005	
ABDCMDL00360010	ABDCMDL00360015	Policies & Procedures: Order Monitoring Program	10/1/2005	1/5/2010
ABDCMDL00359912	ABDCMDL00359912	Policies & Procedures: PDMA Listed Chemical Training.	10/1/2005	2/8/2006
ABDCMDL00360006	ABDCMDL00360007	Policies & Procedures: Pharmaceutical Licensing - DEA and State	10/1/2005	
ABDCMDL00359909	ABDCMDL00359909	Policies & Procedures: Reporting requirements for listed chemicals	10/1/2005	3/31/2006
ABDCMDL00359846	ABDCMDL00359846	Policies & Procedures: Reporting requirements for prescription drugs	10/1/2005	3/31/2006
ABDCMDL00359908	ABDCMDL00359908	Policies & Procedures: Reporting requirements for prescription drugs	10/1/2005	11/29/2010
ABDCMDL00035504	ABDCMDL00035510	Policies & Procedures: Schedule 2 Controlled Substances	10/1/2005	10/23/2008
ABDCMDL00035514	ABDCMDL00035520	Policies & Procedures: Schedule 2 Controlled Substances	10/1/2005	8/31/2010
ABDCMDL00359933	ABDCMDL00359933	Policies & Procedures: Schedule 3 3N 4 5 controlled substances	10/1/2005	2/1/2006
ABDCMDL00379814	ABDCMDL00379815	Policies & Procedures: State Licensing Exemptions	10/1/2005	3/16/2018
ABDCMDL00359880	ABDCMDL00359881	Policies & Procedures: Storage of controlled substance records	10/1/2005	2/3/2006
ABDCMDL00359882	ABDCMDL00359883	Policies & Procedures: Storage of controlled substance records	10/1/2005	9/30/2006
ABDCMDL00359884	ABDCMDL00359885	Policies & Procedures: storage of controlled substance records	10/1/2005	8/31/2010
ABDCMDL00355566	ABDCMDL00355568	Policies & Procedures: Storage of Controlled Substance Records	10/1/2005	9/12/2011
ABDCMDL000027412	ABDCMDL00002745	Receiving of Schedule 2 Controlled Substances	10/1/2005	1/23/2017

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ABDCMDL00364281	ABDCMDL00364283	Policies & Procedures: Retail Pharmacy Targeted Visits	10/1/2005	6/17/2013
ABDCMDL00002340	ABDCMDL00002345	Order Monitoring Program (OMP): Policies and Procedures	10/1/2005	1/5/2010
ABDCMDL00364275	ABDCMDL00364280	Policies & Procedures: DCP - Order Monitoring Program	10/2/2005	6/17/2013
ABDCMDL00004016	ABDCMDL00004018	Policies & Procedures: Excessive/Suspicious Order Investigation Program	12/1/2005	6/19/2007
ABDCMDL00004000	ABDCMDL00004004	Policies & Procedures: Excessive/Suspicious Order Investigation Program	12/1/2005	6/28/2007
ABDCMDL00359957	ABDCMDL00359961	Policies & Procedures: Excessive/Suspicious Order Investigation Program	12/1/2005	6/29/2007
ABDCMDL00359965	ABDCMDL00359969	Policies & Procedures: Order Monitoring Program	12/1/2005	10/1/2008
ABDCMDL00359970	ABDCMDL00359974	Policies & Procedures: Order Monitoring Program (OMP)	12/1/2005	10/1/2009
ABDCMDL00360029	ABDCMDL00360034	Policies & Procedures: Order Monitoring Program (OMP)	12/1/2005	1/5/2010
ABDCMDL00035707	ABDCMDL00035709	Policies & Procedures: Order Monitoring Verification / Investigation Program	12/1/2005	5/8/2007
ABDCMDL00359962	ABDCMDL00359964	Policies & Procedures: Possible Excessive/Suspicious Order Review	12/1/2005	
ABDCMDL00398249	ABDCMDL00398249	LawTrac General Matter Report re: DEA Pharmacy Initiative	12/1/2005	5/18/2018
ABDCMDL00398249	ABDCMDL00398249	Lawtrac Matter Report: DEA Internet Pharmacy Initiative	12/1/2005	
ABDCMDL00359895	ABDCMDL00359898	Policies & Procedures: Amerisourcebergen Security and Regulatory Compliance Policy and Procedures Manual	12/7/2005	9/17/2011
ABDCMDL00251400	ABDCMDL00251401	Policies & Procedures: CSRA 3.4, Customer Account Due Diligence	12/29/2005	
ABDCMDL00364284	ABDCMDL00364285	Policies & Procedures: Customer Account Due Diligence	1/24/2006	7/21/2015
ABDCMDL00035397	ABDCMDL00035399	Policies & Procedures: New Customer Account Due Diligence	5/8/2007	10/2/2008
ABDCMDL00035418	ABDCMDL00035419	Policies & Procedures: New Customer Account Due Diligence	5/8/2007	10/12/2011

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ABDCMDL00037325	ABDCMDL00037326	Policies & Procedures: New Customer Account Due Diligence	5/8/2007	10/12/2011
ABDCMDL00360297	ABDCMDL00360298	Policies & Procedures: New Retail Pharmacy Account Due Diligence	5/8/2007	6/19/2007
ABDCMDL00004011	ABDCMDL00004012	Policies & Procedures: New Retail Pharmacy Account Due Diligence	5/8/2007	
ABDCMDL00360302	ABDCMDL00360304	Controlled Substance Suspicious Order Monitoring/Investigations (Draft)	5/8/2007	
ABDCMDL00360308	ABDCMDL00360310	Policies & Procedures: Controlled Substance Suspicious Order Monitoring/Investigations	5/8/2007	
ABDCMDL00002325	ABDCMDL00002334	Memorandum re: OMP Distribution Center Procedures	5/16/2007	
ABDCMDL00003061	ABDCMDL00003063	Controlled Substance and Listed Chemical Order Monitoring Program (OMP)	5/21/2007	10/23/2008
ABDCMDL00003976	ABDCMDL00003978	Policies & Procedures: Controlled Substance and Listed Chemical Order Monitoring Program (OMP)	6/29/2007	2/18/2008
ABDCMDL00035500	ABDCMDL00035502	Policies & Procedures: Controlled Substance and Listed Chemical Order Monitoring Program (OMP)	6/30/2007	6/28/2008
ABDCMDL00355541	ABDCMDL00355543	Policies & Procedures: Controlled Substance and Listed Chemical Order Monitoring Program (OMP)	6/30/2007	7/28/2008
ABDCMDL00355589	ABDCMDL00355591	Policies & Procedures: Controlled Substance and Listed Chemical Order Monitoring Program (OMP)	6/30/2007	10/23/2008
ABDCMDL00360311	ABDCMDL00360313	Policies & Procedures: Controlled Substance and Listed Chemical Order Monitoring Program (OMP)	6/30/2007	
ABDCMDL00314176	ABDCMDL00314179	ABC Diversion Control Program Revised	6/30/2007	
ABDCMDL00251392	ABDCMDL00251394	Policies & Procedures: CSRA 2.25, Retail Pharmacy Targeted Visits	6/30/2007	
ABDCMDL00360016	ABDCMDL00360017	Policies & Procedures: Retail Pharmacy Targeted Visits	6/2/2008	10/21/2008
ABDCMDL00360018	ABDCMDL00360019	Policies & Procedures: DEA Daily Reporting	10/1/2008	

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ABDCMDL00240915	ABDCMDL00240915	June 2009 version of CSRA Form 15, Notice to all Employees re: statutory duty to report diversion	10/1/2008	
ABDCMDL00359914	ABDCMDL00359918	Policies & Procedures: Schedule 2 Purchasing Procedures	10/21/2008	8/31/2010
ABDCMDL00355592	ABDCMDL00355598	Policies & Procedures: Schedule 2 Controlled Substances	6/1/2009	9/19/2011
ABDCMDL00284968	ABDCMDL00284969	Policies & Procedures: CSRA 3.4, Customer Account Due Diligence	8/31/2010	
ABDCMDL00251406	ABDCMDL00251406	GNPPN Accounts Terminated From PBMS	7/1/2011	
ABDCMDL00360020	ABDCMDL00360022	Policies & Procedures: CSRA 3.13, Ceasing or Suspending Shipments to Customers	10/1/2011	
ABDCMDL00268926	ABDCMDL00268928	OMP Post DC Deployment process update	10/14/2011	
ABDCMDL00268912	ABDCMDL00268925	OMP: Setting the Record Straight process overview	12/1/2011	
ABDCMDL00003704	ABDCMDL00003706	Order Monitoring Program (OMP) Post DC Deployment: A Customer Overview	1/30/2012	
ABDCMDL00003707	ABDCMDL00003720	Order Monitoring Program (OMP): Setting the Record Straight	1/30/2012	
ABDCMDL00269522	ABDCMDL00269524	Policies & Procedures: Documentation New Customer Due Diligence Investigations	1/30/2012	
ABDCMDL00280859	ABDCMDL00280860	Order Monitoring Program - Order Review Guidelines	1/30/2012	
ABDCMDL00003686	ABDCMDL00003686	Policies & Procedures: Order Monitoring Program Overview	11/27/2012	
ABDCMDL00251402	ABDCMDL00251405	Policies & Procedures: CSRA 3.5, Customer Due Diligence Documentation	1/7/2013	
ABDCMDL00364286	ABDCMDL00364289	Policies & Procedures: Customer Due Diligence Documentation	3/8/2013	
ABDCMDL00282236	ABDCMDL00282238	Guidelines for Order Review	5/10/2013	
ABDCMDL00251386	ABDCMDL00251391	Policies & Procedures: CSRA 2.12, Order Monitoring Program (OMP)	5/10/2013	
ABDCMDL00379750	ABDCMDL00379752	Policies & Procedures: ABC Diversion Control Policy	6/10/2013	
ABDCMDL00244953	ABDCMDL00244954	Policies & Procedures: Order Review Guidelines	6/19/2013	

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ABDCMDL00251418	ABDCMDL00251418	Interim Policy - Customer Sizing	6/21/2013	
ABDCMDL00251397	ABDCMDL00251399	Policies and Procedures: Suspending Controlled Substance Shipments to Customers	12/5/2013	
ABDCMDL00252386	ABDCMDL00252386	Interim Policy - Customer Questionnaire Update	2/27/2014	
ABDCMDL00379774	ABDCMDL00379775	Policies & Procedures: Order Monitoring Program Guidelines	2/27/2014	
ABDCMDL00302431	ABDCMDL00302431	Interim Policy - Know Your Customer due diligence	2/11/2015	
ABDCMDL00159041	ABDCMDL00159042	DCP 12.2.0 - Order Monitoring Program Policy dpm 082616.docx	6/8/2016	
ABDCMDL00252384	ABDCMDL00252385	Email from E Cherveny to D May re: Interim Policy Update for Customer Due Diligence	8/11/2016	
ABDCMDL00004264	ABDCMDL00004284	2016 Revised Versions of Security Policies and Procedures (S&RC 2.0 - S&RC 18.03)	8/26/2016	
ABDCMDL00172114	ABDCMDL00172114	Diversion Control Program Policies and Procedures: Appendix A. OMP Annual Review Checklist	12/3/2016	
ABDCMDL00364201	ABDCMDL00364205	Policies & Procedures: DCP 12.3.10 - Ongoing Monitoring Activities.docx	12/4/2016	
ABDCMDL00172099	ABDCMDL00172099	Diversion Control Program Policies and Procedures: Appendix B	1/1/2017	
ABDCMDL00172132	ABDCMDL00172134	Diversion Control Program Policies and Procedures: Communicating Adverse Customer Actions	1/1/2017	
ABDCMDL00172108	ABDCMDL00172111	Diversion Control Program Policies and Procedures: Consumption Reviews	1/1/2017	
ABDCMDL00017062	ABDCMDL00017068	Diversion Control Program Policies and Procedures: Consumption Reviews & Diversion Control Program Policies and Procedures: OMP Annual Review	1/1/2017	
ABDCMDL00172096	ABDCMDL00172098	Diversion Control Program Policies and Procedures: Customer Peer Group Maintenance	1/1/2017	
ABDCMDL00172115	ABDCMDL00172117	Diversion Control Program Policies and Procedures: Diversion Control Annual Audit	1/1/2017	

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ABDCMDL00017069	ABDCMDL00017073	Diversion Control Program Policies and Procedures: Diversion Control Annual Audit and Ongoing Monitoring Activities	1/1/2017	
ABDCMDL00172129	ABDCMDL00172131	Diversion Control Program Policies and Procedures: Due Diligence Documentation	1/1/2017	
ABDCMDL00172100	ABDCMDL00172104	Diversion Control Program Policies and Procedures: Identifying and Reporting Suspicious Orders	1/1/2017	
ABDCMDL00017026	ABDCMDL00017027	Diversion Control Program Policies and Procedures: Know Your Customer Due Diligence	1/1/2017	
ABDCMDL00017028	ABDCMDL00017033	Diversion Control Program Policies and Procedures: New Customer Due Diligence	1/1/2017	
ABDCMDL00017066	ABDCMDL00017068	Diversion Control Program Policies and Procedures: OMP Annual Review	1/1/2017	
ABDCMDL00017041	ABDCMDL00017043	Diversion Control Program Policies and Procedures: OMP Methodology	1/1/2017	
ABDCMDL00172120	ABDCMDL00172124	Diversion Control Program Policies and Procedures: Ongoing Monitoring Activities	1/1/2017	
ABDCMDL00172118	ABDCMDL00172119	Diversion Control Program Policies and Procedures: Ongoing Monitoring Policy	1/1/2017	
ABDCMDL00017039	ABDCMDL00017040	Diversion Control Program Policies and Procedures: Order Monitoring Program	1/1/2017	
ABDCMDL00017044	ABDCMDL00017049	Diversion Control Program Policies and Procedures: Product Family Risk Assessment	1/1/2017	
ABDCMDL00172125	ABDCMDL00172128	Diversion Control Program Policies and Procedures: Targeted Pharmacy Visits	1/1/2017	
ABDCMDL00037327	ABDCMDL00037389	January 1, 2017 Diversion Control Program and Due Diligence Policies and Procedures (DCP-12.1.0 -DCP SOP-12.3.20)	1/1/2017	
ABDCMDL00000038	ABDCMDL00000038	Policies & Procedures: Amerisource Bergen Order Monitoring Program/Customer Types	1/1/2017	
ABDCMDL00287472	ABDCMDL00287473	Policies & Procedures: DCP 12 1 0 - Know Your Customer Policy.pdf	1/1/2017	

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ABDCMDL00162260	ABDCMDL00162262	Policies & Procedures: DCP 12 3 20 - Communicating Adverse Customer Actions.docx	1/1/2017	
ABDCMDL00002303	ABDCMDL00002303	Policies & Procedures: Appendix A. OMP Annual Review Checklist	1/1/2017	
ABDCMDL00002684	ABDCMDL00002684	Policies & Procedures: Appendix A. OMP Annual Review Checklist	1/1/2017	
ABDCMDL00379708	ABDCMDL00379708	March 2018 version of CSRA Form 15, Notice to all Employees re: statutory duty to report diversion	4/25/2017	
ABDCMDL00379712	ABDCMDL00379712	Policies & Procedures: DEA Order Form Guidelines	4/25/2017	
ABDCMDL00172112	ABDCMDL00172113	Diversion Control Program Policies and Procedures: OMP Annual Review	4/25/2017	
ABDCMDL00002675	ABDCMDL00002677	Policies & Procedures: Amerisource Bergen Corporation - OMP Enhancements	11/13/2017	
ABDCMDL00002202	ABDCMDL00002204	Policies & Procedures: Amerisource Bergen Corporation - OMP Enhancements – Adjudication Reason Codes – Preliminary Lists	11/13/2017	
ABDCMDL00000044	ABDCMDL00000046	Policies & Procedures: Amerisource Bergen Corporation - OMP Enhancements Exhibit A	11/13/2017	
ABDCMDL00002211	ABDCMDL00002211	Policies & Procedures: Appendix A. OMP Annual Review Checklist	11/13/2017	
ABDCMDL00003687	ABDCMDL00003690	Policies & Procedures: Diversion Control Program	11/13/2017	
ABDCMDL00003700	ABDCMDL00003701	Policies & Procedures: Guidelines for Threshold Reviews	11/13/2017	
ABDCMDL00003702	ABDCMDL00003703	Policies & Procedures: Order Monitoring Program Questions and Answers	11/13/2017	
ABDCMDL00000089	ABDCMDL00000089	CSRA Form 18 – Suspicious Order Monitoring – Base Levels	11/13/2017	
ABDCMDL00002190	ABDCMDL00002192	Policies & Procedures: Amerisource Bergen Corporation - OMP Annual Refresh 2016	11/13/2017	
ABDCMDL00002282	ABDCMDL00002284	Policies & Procedures: Amerisource Bergen Corporation - OMP Annual Refresh 2016 Appendix A	11/13/2017	

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ABDCMDL00002663	ABDCMDL00002665	Policies & Procedures: Amerisource Bergen Corporation - OMP Annual Refresh 2016 Appendix A	11/13/2017	
ABDCMDL00000032	ABDCMDL00000034	Policies & Procedures: Amerisource Bergen Corporation - OMP Annual Refresh 2016 Appendix A	11/13/2017	
ABDCMDL00004285	ABDCMDL00004287	Policies & Procedures: AmerisourceBergen Corporation - OMP Annual Refresh 2016 – Product Families	11/13/2017	
ABDCMDL00478754	ABDCMDL00478756	Risk Management Department: Law Pack Matter and Assignment Entry and Status Updating, Time Entry, Tracking and Reporting	3/1/2018	
ABDCMDL00478765	ABDCMDL00478767	Policies & Procedures: Index	3/1/2018	